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December 12, 2007

26754.00007

VIA OVERNIGHT COURIER

Linda Ketellapper, Case Developer
 Mail Code SFD-7-5
 U. S. Environmental Protection Agency
 75 Hawthorne Street
 San Francisco, CA 94105

Re: General Notice Letters and Section 104(e) Requests to Western
 Magnesium Corp., General Partner of First Dice Road Company,
 a Limited Partnership, C.P. Chemicals, Inc., and Phibro-Tech, Inc.

Dear Ms. Ketellapper:

Enclosed please find responses to the above-referenced letters, dated November 7, 2007. I have signed the Primary Contact Designation Form for all three business entities, which are enclosed, as requested by your General Notice letters. For purposes of your Section 104(e) Request letters, I am the person to whom EPA should direct future correspondence in these matters.

Your General Notice letters request, as part of your authority under CERCLA Section 104(e), a report on the status of clean-up or other activities at the facility located at 8851 Dice Road, Santa Fe Springs. We asked the environmental consultant for that site, Iris Environmental, to prepare a summary report for you. The letter answers this request for the entities to which you addressed the General Notice letters. The letter is also enclosed.

Your Section 104(e) Request for Information letters require that the information set forth in Enclosure B be provided to you. The appropriate financial information that is available to the addressees is also enclosed. The information was provided by David Storbeck, Vice-President of Finance, and Treasurer, of Phibro Animal Health Corporation, the parent company of Western Magnesium Corp. and C.P. Chemicals, Inc. Phibro-Tech, Inc. is a corporate subsidiary of C.P. Chemicals, Inc. Mr. Storbeck's address is 65 Challenger Road, 3rd Floor, Ridgefield Park, NJ 07660. His telephone number is (201) 329-7300.

The financial information provided herein is stamped "Confidential" on each page. The companies submitting the information consider it confidential pursuant to Section 8 of Enclosure A to your Section 104(e) request letters.

Linda Ketellapper, Case Developer
U.S. Environmental Protection Agency
December 12, 2007
Page 2

Pursuant to that Section 8, the companies assert: (a) all of the information is entitled to confidential treatment; (b) confidential treatment is desired permanently; (c) the companies have taken measures against undesired disclosure by not making the information available to anyone outside the companies, affiliated companies, and their agents, except in appropriate circumstances where the disclosure is subject to an obligation of confidentiality against further disclosure; (d) it has not otherwise been disclosed to others; (e) EPA routinely considers this type of tax, income, and other financial information to be confidential; and (f) disclosure would result in competitive harm because competitors could more easily gauge the financial strengths and weaknesses of the companies. If for any reason EPA needs further verification of the confidential nature of this information, please contact me immediately.

I have also taken your recommendation and have spoken to PRP Counsel Mr. Gutteridge about this matter. I look forward to speaking with you further.

Sincerely yours,



Peter H. Weiner
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

Pages 3-7

Removed Under CBI (Confidential Business Information)

PRIMARY CONTACT DESIGNATION FORM

C.P. Chemicals, Inc.


PLEASE COMPLETE AND RETURN THIS FORM WITHIN THIRTY CALENDAR DAYS OF RECEIPT

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

1. Please provide the following information for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding Omega. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Peter H. Weiner Contact's Title: Partner
Contact's Firm Name:	Paul, Hastings, Janofsky & Walker LLP
Street Address (no P.O. Box):	55 Second Street
City, State & Zip:	San Francisco, CA 94105
Telephone Number:	415-856-7000 Fax Number: 415-856-7100
E-mail Address:	peterweiner@paulhastings.com
Web-site Address:	www.paulhastings.com
2. Other information: Law/Consulting Firm Name (if applicable):	

3. Printed Name and Signature of Person Completing This Form

Peter H. Weiner	Partner	Paul, Hastings, Janofsky & Walker LLP
Printed Name	Title	Company/Organization
		12/10/07
Signature		Date

4. Please return this form to:

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Mail Code SFD-7-5
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75 Hawthorne St.
San Francisco, CA 94105

PRIMARY CONTACT DESIGNATION FORM

First Dice Road Company, a California Limited Partnership

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Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Peter H. Weiner Contact's Title: Partner
Contact's Firm Name:	Paul, Hastings, Janofsky & Walker LLP
Street Address (no P.O. Box):	55 Second Street
City, State & Zip:	San Francisco, CA 94105
Telephone Number:	415-856-7000 Fax Number: 415-856-7100
E-mail Address:	peterweiner@paulhastings.com
Web-site Address:	www.paulhastings.com
2. Other information: Law/Consulting Firm Name (if applicable):	

3. Printed Name and Signature of Person Completing This Form

Peter H. Weiner

Partner Paul, Hastings, Janofsky & Walker LLP

Printed Name	Title	Company/Organization
		12/10/07
Signature		Date

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PRIMARY CONTACT DESIGNATION FORM

Phibro-Tech, Inc.

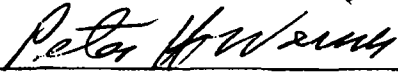
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Name of Designated Contact :	Peter H. Weiner Contact's Title: Partner
Contact's Firm Name:	Paul, Hastings, Janofsky & Walker LLP
Street Address (no P.O. Box):	55 Second Street
City, State & Zip:	San Francisco, CA 94105
Telephone Number:	415-856-7000 Fax Number: 415-856-7100
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3. Printed Name and Signature of Person Completing This Form

Peter H. Weiner	Partner	Paul, Hastings, Janofsky & Walker LLP
Printed Name	Title	Company/Organization
		12/14/07
Signature		Date

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Pages 11-151
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